

From: [Curley, Michael](#)
To: [Little, Shauna](#)
Subject: RE: Irving
Date: Friday, April 24, 2020 12:32:00 PM

That sounds good.

From: Little, Shauna <Little.Shauna@epa.gov>
Sent: Friday, April 24, 2020 11:58 AM
To: Curley, Michael <Curley.Michael@epa.gov>
Subject: RE: Irving

Took a look at the FEMA maps as you asked. Here's what I suggest saying (minor tweaks): According to the FEMA map(s) covering the location of the Facility, the terminal yard, including the truck loading rack, as well as all areas of the property west of Lee Burbank Highway, are within the SFHA and are classified Zone AE. See <https://msc.fema.gov/portal/search>. The tank farm, however, is not within the SFHA and is classified Zone X. *Id.*

The terminal yard is all of the buildings, parking areas and the OWS is right outside the tank farm berm at the bottom left corner. Sound good?

~S

From: Curley, Michael <Curley.Michael@epa.gov>
Sent: Friday, April 24, 2020 11:21 AM
To: Little, Shauna <Little.Shauna@epa.gov>
Subject: RE: Irving

If we're talking about indicator parameters, the citation should be 40 CFR § 122.44(d)(1)(vi)(C). I'm not sure exactly to which comment of mine you're referring, but maybe you're thinking of my comment that reference to 122.44(d)(1)(vi)(C)(3) should drop the "(3)" at the end?

From: Little, Shauna <Little.Shauna@epa.gov>
Sent: Friday, April 24, 2020 10:59 AM
To: Curley, Michael <Curley.Michael@epa.gov>
Subject: RE: Irving

One of your comments pertaining to indicator parameters mentioned subpart(?) D in addition to 40 CFR § 122.44(d)(1)(vi)(A-C). Should the citation justifying the use of indicator parameters (in the indicator parameter section) read 40 CFR § 122.44(d)(1)(vi)(A-D) rather than 40 CFR § 122.44(d)(1)(vi)(A-C)?

From: Curley, Michael <Curley.Michael@epa.gov>
Sent: Friday, April 24, 2020 10:41 AM
To: Little, Shauna <Little.Shauna@epa.gov>
Subject: RE: Irving

Ha! Yes, I think I have seen that expression on your face!

From: Little, Shauna <Little.Shauna@epa.gov>
Sent: Friday, April 24, 2020 10:34 AM
To: Curley, Michael <Curley.Michael@epa.gov>
Subject: RE: Irving

:-/ (I think you've seen this expression on my face...haha).

Thank you!

~S

From: Curley, Michael <Curley.Michael@epa.gov>

Sent: Friday, April 24, 2020 9:51 AM

To: Little, Shauna <Little.Shauna@epa.gov>

Subject: RE: Irving

No, "part" only applies to regs; for the CWA, continue to use §.

From: Little, Shauna <Little.Shauna@epa.gov>

Sent: Friday, April 24, 2020 9:49 AM

To: Curley, Michael <Curley.Michael@epa.gov>

Subject: RE: Irving

Yes, thank you!

I am accepting track changes now...is "Part" rather than section symbol appropriate for CWA citations as for regulations when it's the larger section? So for example, "under CWA Part 303" vs. "CWA § 303(d)"?

-S

From: Curley, Michael <Curley.Michael@epa.gov>

Sent: Thursday, April 23, 2020 6:48 PM

To: Little, Shauna <Little.Shauna@epa.gov>

Subject: Irving

Hi Shauna-

I've added some new language at the end of the FEMA maps discussion. Take a look and let me know what you think. Also, I have an idea about where the terminal yard (and OWS) is located on the property, but I'm not totally sure. They look to be outside the SFHA, but can you take a look at the FEMA map to confirm, and adjust my edits as necessary?

Thanks

Michael Curley

Assistant Regional Counsel

EPA Region 1 – New England

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